

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case: 2:21-cr-20610
Judge: Goldsmith, Mark A.
MJ: Grand, David R.
Filed: 09-23-2021 At 02:31 PM
INDI USA V. SEALED MATTER (DA)

v.

D-1 Chauncey Williams,
D-2 Mike Chahoua,
D-3 Antonio Jackson,
D-4 Bishop Allen,
D-5 Garcia Moses,
D-6 Donte Turner,
D-7 Reginald Small,
D-8 Eshon Rose,
D-9 James Jackson, and
D-10 Emmanuel Stevens,

Violations:

18 U.S.C. § 1349
18 U.S.C. § 1343
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(j)

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

General Allegations

At all times relevant to this Indictment:

I. ONLINE PURCHASE OF FIREARMS

1. Online Firearm Retailer 1 (OFR-1), Online Firearm Retailer 2 (OFR-2), and Online Firearm Retailer 3 (OFR-3) were all Federal Firearm Licensees (FFLs) that operated primarily online.

2. The procedure for purchasing a firearm legally from an out of state or online FFL requires the customer to utilize a local FFL within the purchaser's home state to complete the transfer. A firearm cannot be mailed directly to the purchaser's residence from out of state; instead, the online FFL sends the firearm to a local FFL. The local FFL then completes the actual transfer of the firearm, which includes the completion of an ATF Form 4473 (Firearms Transaction Record) by the person receiving the firearm.

3. The Form 4473 is a standardized form that is used to document a firearm's transfer, determine if the individual is prohibited from receiving a firearm, and verify that the individual is the "actual" transferee/buyer and not a "straw purchaser," that is, someone illegally purchasing a firearm on behalf of someone else. In other words, if the online FFL is in another state, it is not the online FFL's responsibility to verify the purchaser's identity or ability to purchase a firearm. The local FFL completes the transfer and verifies the requisite information, including by confirming the transferee's identity by reviewing his/her government issued identification.

II. OBTAINING/USING STOLEN CREDIT CARD INFORMATION

4. Individuals' credit card information, including their names, billing addresses, telephone numbers, account numbers, expiration dates, and card verification values (CVVs), is typically initially stolen either in large-scale security breaches of online electronic databases, such as those held by online retailers, or through the use of "skimmers" or other devices to surreptitiously read data off of a credit card used at a retailer. The stolen credit card information is then sold online to other individuals through various outlets, often on the "dark web," and often paid for using cryptocurrency. These individuals purchase the stolen credit card information intending to use it to purchase goods, either over the internet or by loading the stolen credit card information onto physical cards and using them in person.

III. THE SCHEME

A. Participants in the Scheme

5. D-1 CHAUNCEY WILLIAMS, D-2 MIKE CHAHOUA, and D-3 ANTONIO JACKSON were the organizers, leaders, and managers of the scheme. They obtained stolen credit card information using the internet, recruited a straw purchaser for a particular purchase,

purchased the firearms online using the stolen credit card information, instructed the straw purchaser to retrieve the firearms once they were delivered, and in many cases, received the stolen firearms after the straw purchaser obtained them.

6. D-4 BISHOP ALLEN, D-5 GARCIA MOSES, D-6 DONTE TURNER, D-7 REGINALD SMALL, D-8 ESHON ROSE, D-9 JAMES JACKSON, and D-10 EMMANUEL STEVENS were straw purchasers in the scheme. They provided their information to WILLIAMS, CHAHOUA, or JACKSON to be used in an online purchase. Then, when instructed to do so, they went to the local firearm retailer to pick up the firearms and falsely attested to the fact that they were the actual transferees/buyers of the firearms. Once the transaction was complete, they would often keep one or more of the firearms as payment and give the remaining firearms to WILLIAMS, CHAHOUA, or JACKSON.

B. Purpose of the Scheme

7. The purpose of the scheme was to illegally obtain firearms to use, possess, and sell for profit, by using stolen credit card information online, and by using straw purchasers to receive the firearms in person.

C. Description of the Scheme

8. Beginning at least in or around November 2020 and continuing until at least in or around March 2021, defendants D-1 CHAUNCEY WILLIAMS, D-2 MIKE CHAHOUA, D-3 ANTONIO JACKSON, D-4 BISHOP ALLEN, D-5 GARCIA MOSES, D-6 DONTE TURNER, D-7 REGINALD SMALL, D-8 ESHON ROSE, D-9 JAMES JACKSON, and D-10 EMMANUEL STEVENS devised and implemented a scheme to obtain and use stolen credit card information to purchase firearms from online retailers, enlist straw purchasers to retrieve the firearms in-person from a local FFL in exchange for compensation, and then receive the stolen firearms to either personally possess and use or to re-sell the stolen firearms for profit.

9. D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON purchased stolen credit card information online. The stolen card information consisted of the means of identification of other persons, in the form of stolen credit card information—including the 16-digit credit card number, Card Verification Value (CVV), expiration date, and cardholder name and billing address.

10. D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON conspired with and recruited straw purchasers—D-4 ALLEN, D-5 MOSES, D-6 TURNER, D-7 SMALL, D-8 ROSE, D-9 J. JACKSON, and D-10 STEVENS—for the planned transactions, often asking the straw purchaser to send them their name, address, and other contact information to be used for the online purchase of the firearms.

11. D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON placed orders for firearms from online firearm retailers using the stolen credit card information, along with the straw purchaser's name, address, and other contact information, and then selected a local FFL from which to retrieve the firearm.

12. Once the firearms were delivered to the local FFL, D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON directed the designated straw purchaser to pick up the purchased firearms from the local FFL. When the straw purchasers picked up the firearms, they filled out an ATF Form 4473 on which they fraudulently attested to being the actual transferees/buyers of the firearm. The straw purchasers then usually gave the firearms to D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON, who in turn either sold the firearms or

kept them for their own personal use. Occasionally, the straw purchasers were permitted to keep a firearm as compensation.

IV. THE CHARGES

Count 1

Conspiracy to Commit Wire Fraud – 18 USC § 1349

D-1 CHAUNCEY WILLIAMS

D-2 MIKE CHAHOUA

D-3 ANTONIO JACKSON

D-4 BISHOP ALLEN

D-5 GARCIA MOSES

D-6 DONTE TURNER

D-7 REGINALD SMALL

D-8 ESHON ROSE

D-9 JAMES JACKSON

D-10 EMMANUEL STEVENS

13. Paragraphs 1 – 12 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

14. Beginning as early as in or around November 2020 and continuing through at least in or around March 2021, in the Eastern District of Michigan, and elsewhere, the defendants D-1 WILLIAMS, D-2

CHAHOUA, D-3 JACKSON, D-4 ALLEN, D-5 MOSES, D-6 TURNER, D-7 SMALL, D-8 ROSE, D-9 J. JACKSON, and D-10 STEVENS did knowingly and voluntarily conspire, confederate, and agree with each other to commit wire fraud, that is, to devise and execute a scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme, transmitted and caused to be transmitted by means of wire communications in interstate commerce, writings, signs, signals and sounds, all in violation of Title 18, United States Code, Sections 1349 and 1343.

The Purpose of the Conspiracy

15. Paragraphs 1 – 14 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

The Manner and Means of the Conspiracy

16. It was part of the conspiracy that D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON obtained the means of identification of third parties, namely, credit card information, to include names, billing address, account numbers, expiration dates, and CVVs, without lawful authority, by purchasing and downloading the stolen credit card

information using the internet with the intent to use the stolen credit card information to purchase firearms online.

17. It was part of the conspiracy that D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON, used the stolen credit card information to purchase firearms online and direct them to be shipped in interstate commerce to an FFL in the Eastern District of Michigan, using the names and addresses of other members of the conspiracy, with the other member of the conspiracy's knowledge and consent. The other member of the conspiracy's name would be listed as the purchaser of the firearm, and the stolen credit card information would be used as the billing information.

18. It was part of the conspiracy that some members of the conspiracy, under direction of D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON, would go to an FFL in the Eastern District of Michigan to receive and pick up the firearms fraudulently purchased over the internet. They would make false statements on the ATF 4473 while picking up the firearm, including attesting to being the actual transferees/buyers of the firearm.

19. It was part of the conspiracy that the firearms picked up by members of the conspiracy would then be given to D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON in exchange for compensation in the form of U.S. currency or firearms.

20. It was part of the conspiracy that D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON kept and used the firearms or sold them indiscriminately to other individuals for profit, without regard to whether those individuals could legally possess a firearm and with reasonable cause to believe that those individuals were prohibited from possessing or receiving firearms.

21. Some of the firearms purchased, possessed, or received as part of the conspiracy were later recovered in possession of individuals who are prohibited from possessing or receiving firearms.

Counts 2 – 8

Wire Fraud – 18 USC § 1343

D-1 CHAUNCEY WILLIAMS

D-2 MIKE CHAHOUA

D-3 ANTONIO JACKSON

D-4 BISHOP ALLEN

D-5 GARCIA MOSES

D-6 DONTE TURNER

D-7 REGINALD SMALL

THE SCHEME

22. Beginning at an exact date unknown, but as early as in or around November 2020 and continuing through at least in or around March 2021, the defendants devised and intended to devise a scheme to defraud both online and local FFLs, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

THE MANNER AND MEANS OF THE SCHEME

23. The Grand Jury realleges and incorporates by reference paragraphs 16 – 21 as a description of the manner and means of the conspiracy.

24. On or about each of the dates set forth below, in the Eastern District of Michigan and elsewhere, the defendants for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

Count	Date	Defendant	Description
2	11/13/2020	D-1 Chauncey Williams D-5 Garcia Moses	Purchase of Diamondback, DB15, 7.62 caliber pistol from OFR-1
3	1/9/2021	D-1 Chauncey Williams D-5 Garcia Moses	Purchase of two Glock 43 9mm pistols from OFR-2
4	2/4/2021	D-1 Chauncey Williams D-5 Garcia Moses	Purchase of two Adams Arms, AA15, 5.56 caliber rifles and a Century Arms, VSKA47, 7.62 caliber rifle from OFR-2

Count	Date	Defendant	Description
5	1/28/2021	D-3 Antonio Jackson D-4 Bishop Allen	Purchase of a H&K VP9 pistol and an Alex Pro Firearms APF-15 rifle from OFR-2
6	3/10/2021	D-3 Antonio Jackson D-6 Donte Turner	Purchase of a Glock 17 pistol, a Glock 43X pistol, and a Glock 23 pistol from OFR-2
7	1/20/2021	D-2 Mike Chahoua D-7 Reginald Small	Purchase of a Springfield XD 9mm pistol and a Glock 23 .40 caliber pistol from OFR-1
8	1/22/2021	D-2 Mike Chahoua D-7 Reginald Small	Purchase of a SCCY CPX 9mm pistol, a Ruger LC9 9mm pistol, and a Springfield XD .45 caliber pistol from OFR-2

All in violation of Title 18, United States Code, Section 1343.

Counts 9 - 12

Aggravated Identity Theft – 18 USC § 1028A(a)(1)

D-1 CHAUNCEY WILLIAMS

D-2 MIKE CHAHOUA

D-3 ANTONIO JACKSON

25. On or about the following dates, in the Eastern District of Michigan, the defendants, did knowingly use and transfer, without

lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18 United States Code, Section 1028A(c), to wit, wire fraud, under Title 18, United States Code, Section 1343, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

Count	Defendant	Date	Victim
9	D-2 Mike Chahoua	January 29, 2021	N.G.
10	D-3 Antonio Jackson	January 28, 2021	M.W.
11	D-1 Chauncey Williams D-2 Mike Chahoua	January 30, 2021	N.G.
12	D-3 Antonio Jackson	January 30, 2021	L.L.

Counts 13 - 17

Inducing a False Statement in the Acquisition of a Firearm – 18 USC §§ 2, 922(a)(6)

D-1 CHAUNCEY WILLIAMS

D-2 MIKE CHAHOUA

D-3 ANTONIO JACKSON

26. On or about the following dates, in the Eastern District of Michigan, in connection with the acquisition of firearms from a licensed

dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, the defendants aided, abetted, counseled, commanded, induced and procured another individual to knowingly make a false and fictitious statement to a licensed dealer of firearms, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm under chapter 44 of Title 18 in that the defendant aided, abetted, counseled, commanded, induced, and procured another individual to make the false or fictitious statement that another individual was the actual transferee/buyer of the firearm. On the dates set forth below, the individual knowingly made the false statement to a licensed dealer of firearms, which statement was intended and likely to deceive the dealer, in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

Count	Defendant	Date of False Statement	Licensed Dealer of Firearms	Firearm
13	D-1 Chauncey Williams	1/22/2021	Firearm Retailer 1 (FR-1)	2 Glock Model 43, 9mm caliber pistols FN Model 509, 9mm caliber pistol Springfield Armory XD tactical, .45 caliber pistol
14	D-2 Mike Chahoua	11/27/2020	Firearm Retailer 2 (FR-2)	Glock 19 pistol
15	D-2 Mike Chahoua	1/28/2021	Firearm Retailer 3 (FR-3)	2 FNH 509 pistols
16	D-2 Mike Chahoua	1/28/2021	Firearm Retailer 4 (FR-4)	FNH 509 pistol
17	D-3 Antonio Jackson	3/18/2021	Firearm Retailer 5 (FR-5)	Glock 17 pistol Glock 43X pistol Glock 23 pistol

Counts 18 - 39

**Making a False Statement in the Acquisition of a Firearm –
18 USC § 922(a)(6)**

D-4 BISHOP ALLEN

D-5 GARCIA MOSES

D-6 DONTE TURNER

D-7 REGINALD SMALL

D-8 ESHON ROSE

D-9 JAMES JACKSON

D-10 EMMANUEL STEVENS

27. On or about the following dates, in the Eastern District of Michigan, in connection with the acquisition of firearms from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, the defendants knowingly made a false and fictitious statement to a licensed dealer of firearms, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18 in that the defendant represented that he was the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count	Defendant	Date of False Statement	Licensed Dealer of Firearms	Firearm
18	D-4 Bishop Allen	11/27/2020	Firearm Retailer 2 (FR-2)	American Tactical, Omni hybrid pistol Glock 19 pistol
19	D-4 Bishop Allen	1/28/2021	Firearm Retailer 4 (FR-4)	FNH 509 pistol
20	D-4 Bishop Allen	1/28/2021	Firearm Retailer 3 (FR-3)	2 FNH 509 pistols
21	D-4 Bishop Allen	2/3/2021	Firearm Retailer 6 (FR-6)	H&K VP9 pistol Alex Pro Firearms APF-15 Rifle
22	D-4 Bishop Allen	2/3/2021	Firearm Retailer 2 (FR-2)	Century Arms Draco pistol Canik TP9SFX pistol
23	D-4 Bishop Allen	2/4/2021	Firearm Retailer 7 (FR-7)	CZ Scorpion

Count	Defendant	Date of False Statement	Licensed Dealer of Firearms	Firearm
24	D-5 Garcia Moses	11/23/2020	Firearm Retailer 8 (FR-8)	Diamondback DB15, 7.62 caliber pistol Glock, G20, 10mm pistol Two Century Arms Draco 7.62 caliber pistols Springfield Armory, XD M 9mm pistol
25	D-5 Garcia Moses	11/25/2020	Firearm Retailer 1 (FR-1)	Smith & Wesson, SD 9 VE 9mm pistol
26	D-5 Garcia Moses	1/22/2021	Firearm Retailer 1 (FR-1)	FN 509 9mm pistol Springfield, EX, .45 caliber pistol Two Glock G43 9mm pistols

Count	Defendant	Date of False Statement	Licensed Dealer of Firearms	Firearm
27	D-5 Garcia Moses	2/18/2021	Firearm Retailer 2 (FR-2)	Two Adams Arms, AA15, 5.56 caliber rifles Century Arms, VSKA47, 7.62 caliber rifle
28	D-6 Donte Turner	3/18/2021	Firearm Retailer 5 (FR-5)	Glock 17 pistol Glock 43X pistol Glock 23 pistol
29	D-7 Reginald Small	1/29/2021	Firearm Retailer 9 (FR-9)	Springfield XDS .45 caliber pistol Ruger LC9 9mm pistol
30	D-7 Reginald Small	1/29/2021	Firearm Retailer 10 (FR-10)	Beretta APX 9mm pistol Springfield XD .45 caliber pistol
31	D-7 Reginald Small	2/3/2021	Firearm Retailer 4 (FR-4)	FN FNX .45 caliber pistol

Count	Defendant	Date of False Statement	Licensed Dealer of Firearms	Firearm
32	D-7 Reginald Small	2/9/2021	Firearm Retailer 11 (FR-11)	Glock 23 .40 caliber pistol Springfield XD9 9mm pistol
33	D-7 Reginald Small	2/10/2021	Firearm Retailer 4 (FR-4)	SCCY CPX 9mm pistol Ruger LC9 9mm pistol Springfield XD .45 caliber pistol
34	D-7 Reginald Small	2/13/2021	Firearm Retailer 12 (FR-12)	Century Arms Mini Draco 7.62 caliber pistol Glock 43X 9mm pistol
35	D-7 Reginald Small	3/7/2021	Firearm Retailer 13 (FR-13)	Springfield XD9 9mm pistol Century Arms Draco 7.62 caliber pistol
36	D-8 Eshon Rose	2/2/2021	Firearm Retailer 2 (FR-2)	Ruger AR 5.56 caliber pistol Glock G17 9mm pistol

Count	Defendant	Date of False Statement	Licensed Dealer of Firearms	Firearm
37	D-9 James Jackson	12/4/2020	Firearm Retailer 7 (FR-7)	Springfield XD 9mm pistol
38	D-9 James Jackson	12/7/2020	Firearm Retailer 8 (FR-8)	Springfield XD .40 caliber pistol Smith & Wesson MP15 .22 caliber rifle
39	D-10 Emmanuel Stevens	2/8/2021	Firearm Retailer 2 (FR-2)	Beretta APX 9mm pistol Ruger Security 9 9mm pistol Sig Sauer P365X 9mm pistol Smith & Wesson MPShield 9mm pistol

Counts 40 - 66

Possession/Receipt of a Stolen Firearm – 18 USC § 922(j)

D-1 CHAUNCEY WILLIAMS

D-2 MIKE CHAHOUA

D-3 ANTONIO JACKSON

D-4 BISHOP ALLEN

D-5 GARCIA MOSES

D-6 DONTE TURNER

D-7 REGINALD SMALL

D-8 ESHON ROSE

D-9 JAMES JACKSON

D-10 EMMANUEL STEVENS

28. On or about the following dates, in the Eastern District of Michigan, the defendants knowingly possessed and received the following stolen firearms, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe these firearms were stolen, in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

Count	Defendant	Date of Receipt or Possession	Firearm
40	D-1 Chauncey Williams	1/22/2021	2 Glock Model 43, 9mm caliber pistols FN Model 509, 9mm caliber pistol Springfield Armory XD tactical, .45 caliber pistol
41	D-2 Mike Chahoua	11/27/2020	American Tactical, Omni hybrid pistol Glock 19 pistol
42	D-2 Mike Chahoua	1/28/2021	2 FNH 509 pistols
43	D-2 Mike Chahoua	1/28/2021	FNH 509 pistol
44	D-3 Antonio Jackson	3/18/2021	Glock 17 pistol Glock 43X pistol Glock 23 pistol
45	D-4 Bishop Allen	11/27/2020	American Tactical, Omni hybrid pistol Glock 19 pistol
46	D-4 Bishop Allen	1/28/2021	FNH 509 pistol
47	D-4 Bishop Allen	1/28/2021	Two FNH 509 pistols
48	D-4 Bishop Allen	2/3/2021	H&K VP9 pistol Alex Pro Firearms APF-15 rifle

Count	Defendant	Date of Receipt or Possession	Firearm
49	D-4 Bishop Allen	2/3/2021	Century Arms Draco pistol Canik TP9SFX pistol
50	D-4 Bishop Allen	2/4/2021	CZ Scorpion pistol
51	D-5 Garcia Moses	11/23/2020	Two Century Arms, Draco, 7.62 caliber pistols Diamondback DB15, 7.62 caliber pistol Springfield Armory, XD M, 9mm pistol Glock, G20, 10mm pistol
52	D-5 Garcia Moses	11/25/2020	Smith & Wesson, SD 9 VE 9mm pistol
53	D-5 Garcia Moes	1/22/2021	FN 509 9mm pistol Springfield, EX, .45 caliber pistol Two Glock G43 9mm pistols

Count	Defendant	Date of Receipt or Possession	Firearm
54	D-5 Garcia Moses	2/18/2021	Two Adams Arms, AA15, 5.56 caliber rifles Century Arms, VSKA47, 7.62 caliber rifle
55	D-6 Donte Turner	3/18/2021	Glock 43X pistol Glock 17 pistol Glock 23 pistol
56	D-7 Reginald Small	1/29/2021	Springfield XDS .45 caliber pistol Ruger LC9 9mm pistol
57	D-7 Reginald Small	1/29/2021	Beretta APX 9mm pistol Springfield XD .45 caliber pistol
58	D-7 Reginald Small	2/3/2021	FN FNX .45 caliber pistol
59	D-7 Reginald Small	2/9/2021	Glock 23 .40 caliber pistol Springfield XD9 9mm pistol

Count	Defendant	Date of Receipt or Possession	Firearm
60	D-7 Reginald Small	2/10/2021	SCCY CPX 9mm pistol Ruger LC9 9mm pistol Springfield XD .45 caliber pistol
61	D-7 Reginald Small	2/13/2021	Century Arms Mini Draco 7.62 caliber pistol Glock 43X 9mm pistol
62	D-7 Reginald Small	3/7/2021	Springfield XD9 9mm pistol Century Arms Draco 7.62 caliber pistol
63	D-8 Eshon Rose	2/2/2021	Ruger AR 5.56 caliber pistol Glock G17 9mm pistol
64	D-9 James Jackson	12/4/2020	Springfield XD 9mm pistol
65	D-9 James Jackson	12/7/2020	Springfield XD9 .40 caliber pistol Smith & Wesson MP15 .22 caliber rifle

Count	Defendant	Date of Receipt or Possession	Firearm
66	D-10 Emmanuel Stevens	2/8/2021	Beretta APX 9mm pistol Ruger Security 9 9mm pistol Sig Sauer P365X 9mm pistol Smith & Wesson MPShield 9mm pistol

Count 67

**Making or Inducing a False Statement in the
Acquisition of a Firearm –
18 USC §§ 2, 922(a)(6)**

D-1 CHAUNCEY WILLIAMS

D-5 GARCIA MOSES

29. On or about July 24, 2020, in the Eastern District of Michigan, in connection with the acquisition of a firearm—a Glock 19 GEN 4 9mm pistol—from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, the defendants knowingly made and induced a false and fictitious statement to a licensed dealer of firearms, which statement was intended and likely to

deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18 in that the defendant represented that he was the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

Forfeiture Allegations

(18 U.S.C. §§ 981, 924 and 28 U.S.C. § 2461)

1. The allegations contained in Counts One through Eight and Thirteen through Sixty-Seven of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981 and 924, and Title 28, United States Code, Section 2461.

2. Upon conviction of the offense charged in Count One of this Indictment in violation of Title 18, United States Code, Section 1349, defendants D-1 CHAUNCEY WILLIAMS, D-2 MIKE CHAHOUA, D-3 ANTONIO JACKSON, D-4 BISHOP ALLEN, D-5 GARCIA MOSES, D-6 DONTE TURNER, D-7 REGINALD SMALL, D-8 ESHON ROSE, D-9 JAMES JACKSON, and D-10 EMMANUEL STEVENS shall forfeit to the United States any property, real or personal, which constitutes or is

derived from proceeds, obtained directly or indirectly, as a result of such violation, pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c).

3. Upon conviction of any of the offenses charged in Counts Two through Eight of this Indictment in violation of Title 18, United States Code, Section 1343, defendants D-1 WILLIAMS, D-2 CHAHOUA, D-3 JACKSON, D-4 ALLEN, D-5 MOSES, D-6 TURNER, and D-7 SMALL shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds, obtained directly or indirectly, as a result of the violations, pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c).

4. Upon conviction of any of the offenses charged in Counts Thirteen through Seventeen of this Indictment, in violation of Title 18, United States Code, Sections 2 and 922(a)(6), defendants D-1 WILLIAMS, D-2 CHAHOUA, and D-3 JACKSON shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in said offenses.

5. Upon conviction of any of the offenses charged in Counts Eighteen through Thirty-Nine of this Indictment, in violation of Title 18, United States Code, Section 922(a)(6), defendants D-4 ALLEN, D-5 MOSES, D-6 TURNER, D-7 SMALL, D-8 ROSE, D-9 J. JACKSON, and D-10 STEVENS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in said offenses.

6. Upon conviction of any of the offenses charged in Counts Forty through Sixty-Six of this Indictment, in violation of Title 18, United States Code, Section 922(j), defendants D-1 WILIAMS, D-2 CHAHOUA, D-3 JACKSON, D-4 ALLEN, D-5 MOSES, D-6 TURNER, D-7 SMALL, D-8 ROSE, D-9 J. JACKSON, and D-10 STEVENS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in said offenses.

7. Upon conviction of the offense charged in Count Sixty-Seven of this Indictment, in violation of Title 18, United States Code, Sections 2 and 922(a)(6), defendants D-1 WILIAMS and D-5 MOSES, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in said offense.

8. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of the convicted defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code,

Section 2461(c), to seek to forfeit any other property of the convicted defendant up to the value of the forfeitable property described above.

9. Money Judgment: Upon conviction of violating any of the offenses alleged in Counts One through Eight of this Indictment, the convicted defendants shall be ordered to pay the United States a sum of money equal to the total amount of proceeds the convicted defendants obtained as a result of such violations.

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

s/ Benjamin Coats
BENJAMIN COATS
Chief, Major Crimes Unit
Assistant United States Attorney

s/ Erin Ramamurthy
ERIN RAMAMURTHY
Assistant United States Attorney

s/ Andrew Picek
ANDREW PICEK
Assistant United States Attorney

Dated: September 23, 2021

United States District Court
Eastern District of Michigan

Criminal Case Co

Case: 2:21-cr-20610
Judge: Goldsmith, Mark A.
MJ: Grand, David R.
Filed: 09-23-2021 At 02:31 PM
INDI USA V. SEALED MATTER (DA)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>ELR</u>

Case Title: USA v. Chauncey Williams, et al

County where offense occurred : Wayne County and elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☒ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

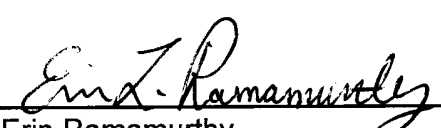
Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 23, 2021
Date


 Erin Ramamurthy
 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.